

**RACHEL THOMAS (SBN 244527)**  
**ALE BURKE-VALLEJO (SBN 353890)**  
**GREENFIELD LLP**  
55 S. Market Street, Suite 1500  
San Jose, California 95113  
Telephone: (408) 995-5600  
Email: [rthomas@greenfieldlaw.com](mailto:rthomas@greenfieldlaw.com)  
[aburke-vallejo@greenfieldlaw.com](mailto:aburke-vallejo@greenfieldlaw.com)

**JOHN W. HARBIN** (*Pro Hac Vice*)  
**WARREN J. THOMAS** (*Pro Hac Vice*)  
MEUNIER CARLIN & CURFMAN LLC  
999 Peachtree Street NE, Suite 1300  
Atlanta, GA 30309  
Telephone: (404) 645-7700  
Email: [jharbin@mcciplaw.com](mailto:jharbin@mcciplaw.com)  
[wthomas@mcciplaw.com](mailto:wthomas@mcciplaw.com)

Attorneys for Plaintiff/Counter-Defendant NUMBER 14 B.V.  
Specially Appearing for Counter-Defendants RUDY ESCHAUZIER and NICO VAN RIJN

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

NUMBER 14 B.V.,

Case No.: 5:24-cv-02435-EKL

Plaintiff,

**PLAINTIFF'S RESPONSE TO  
DEFENDANTS AND  
COUNTERCLAIMANTS'  
ADMINISTRATIVE MOTION  
UNDER SEAL**

ANALOG DEVICES, INC.; MAXIM  
INTEGRATED PRODUCTS, INC.

## Defendants.

---

ANALOG DEVICES, INC.; MAXIM  
INTEGRATED PRODUCTS, INC..

## Counterclaimants,

AN ESCALAZIER

NUMBER 14 B.V., RUDY ESCHAU  
NICO VAN RIJN

## Counter-Defendants

1 Plaintiff and Counter-Defendant NUMBER 14 B.V. ("Plaintiff" or "Number 14") submits  
2 this response to "Defendants and Counterclaimants' Administrative Motion to File Under Seal,"  
3 ECF No. 116, filed by Defendants Analog Devices, Inc. ("ADI") and Maxim Integrated Products,  
4 Inc. ("Maxim") (collectively, "Defendants") on March 24, 2025.

5 Without prejudice to its ability to later challenge the confidentiality of the underlying  
6 information (or the level of confidentiality designation, such as Plaintiff's forthcoming opposition  
7 to Defendants' Motion to Retain Confidentiality, ECF No. 115, based on the proposed *level* of  
8 confidentiality), Plaintiff *does not oppose* Defendants' request for leave to file under seal (ECF No.  
9 116).

GREENFIELD

10  
11  
12 Dated: March 27, 2025

13 By:/s/Warren J. Thomas  
14 Rachel Thomas  
Ale Burke-Vallejo  
GREENFIELD LLP

15 John W. Harbin (*pro hac vice*)  
16 Warren J. Thomas (*pro hac vice*)  
MEUNIER CARLIN & CURFMAN LLC

17  
18 Attorneys for Plaintiff/Counter-Defendant NUMBER 14 B.V.  
19 Specially Appearing for Counter-Defendants RUDY  
20 ESCHAUZIER, and NICO VAN RIJN  
21  
22  
23  
24  
25  
26  
27  
28